

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**DEFENDANT TRIS PHARMA, INC.’S UNOPPOSED MOTION TO EXTEND
DEADLINE TO OPPOSE PLAINTIFFS’ MOTIONS FOR LEAVE TO AMEND**

Defendant Tris Pharma, Inc., by and through undersigned counsel, moves this Court to extend the deadline to file its opposition brief (“Opposition”) to Plaintiffs’ Omnibus Motion for leave to Amend to add Tris Pharma, Inc., *see, e.g.*, ECF Nos. 5565, and 5554 (“Motion to Amend”), to December 6, 2024. Tris Pharma’s Opposition is due September 30, 2024, and this is Tris Pharma’s first request for an extension. ECF No. 5522. On August 16, 2024, certain defendants in this matter (“Moving Defendants” in ECF No. 5590, here, “Certain Defendants”) moved for the same extension now requested by Tris Pharma. ECF No. 5590 (“Motion for Extension”). This Court granted Certain Defendants’ Motion for Extension on August 19, 2024. August 19, 2024, Paperless Order.

At the time Certain Defendants filed their Motion for Extension, Tris Pharma had not yet authorized counsel in this regard. Tris Pharma has since retained undersigned counsel and now moves for the same extension this Court granted to Certain Defendants. Plaintiffs’ Executive Committee (“PEC”) has advised undersigned counsel it does not oppose Tris Pharma’s extension request. In making this extension request, Tris Pharma asserts and relies upon in the reasoning and arguments articulated by Certain Defendants in their Motion for Extension. ECF No. 5590. Specifically, the number of plaintiffs seeking to amend complaints to add Tris Pharm (over two

hundred), warrants this extension. For these reasons and those set forth in Certain Defendants' Motion for Extension, Tris Pharma respectfully requests that this Court grant its extension request.

Respectfully submitted,

BLANK ROME LLP

Dated: August 22, 2024

/s/ Terry M. Henry

Terry M. Henry, Esq.
Fiona Steele, Esq.
One Logan Square
130 North 18th Street
Philadelphia, PA 19103-6998
Telephone: (215) 569-5500
Fax: (215) 569-5555
terry.henry@blankrome.com
fiona.steele@blankrome.com

Attorneys for Defendant, Tris Pharma, Inc.